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7 Attorneys for Plaintiff, SHERYN CAMPRONE, mother of deceased

8 *[Counsels for Defendants listed on following page]*  
9

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 SHERYN CAMPRONE,

13 Plaintiff,

14 v.

15 CITY OF LOS ANGELES, Police  
Officers CLIFFORD PROCTOR,  
16 JONATHAN KAWAHARA, Police  
Chief CHARLIE BECK, in his  
17 individual and official capacity; and  
DOES 1-10, inclusive,

18 Defendants.  
19  
20

Case No: 2:16-cv-00885-R-JC

**NOTICE OF SETTLEMENT  
AND STIPULATION TO  
VACATE ALL PENDING  
DATES; [PROPOSED] ORDER**

Pre-trial Conference:

Date: January 9, 2017

Time: 11:00 a.m.

Crtrm: 8

Trial: February 7, 2016

Time: 9:00 a.m.

Crtrm: 8

1 Michael N. Feuer, Esq.  
2 Thomas H. Peters, Esq.  
3 Cory M. Brente, Esq.  
4 Colleen R. Smith, Esq.  
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10 Attorneys for Defendants,  
11 CITY OF LOS ANGELES and CHIEF CHARLIE BECK  
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13 Thomas C. Hurrell (SBN 119876)  
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21 Attorneys for Defendant,  
22 OFFICE CLIFFORD PROCTOR  
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26 Kenneth P. Korosi  
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Attorneys for Defendant,  
OFFICER JONATHAN KAWAHARA

1 **TO THE CLERK OF THE COURT:**

2 Please take notice that the Parties have reached a settlement, pending City  
3 Council and Mayor approval, to resolve any and all claims in this lawsuit.

4 This matter was filed in this Court on February 9, 2016. A state court case on  
5 behalf of Mr. Glenn's son and the Estate of Brendon Glenn was also filed on  
6 February 9, 2016. The Parties agreed to participate in mediation, which was set for  
7 September 13, 2016. Due to the nature of the issues in this case, the Parties agreed  
8 to defer discovery until the conclusion of the scheduled mediation.

9 On September 13, 2016 the parties agreed to a full settlement and  
10 compromise of the action in the sum of \$4 million dollars which will be paid with  
11 a Stipulated Judgment against the City of Los Angeles *only*. The Parties will attend  
12 a hearing on the petition to confirm the minor's compromise in state court on  
13 November 18, 2016. Due to circumstances beyond the control of either party, the  
14 City Council is unable to issue a decision on this matter until early December 2016.

15 The Parties therefore respectfully request that all deadlines, including the  
16 December 12, 2016 discovery deadline, and jury trial currently set for February 7,  
17 2017 be taken off calendar. Attached as "Exhibit A" is a fully executed Stipulation  
18 for Settlement.

19  
20 Respectfully submitted,

21  
22  
23 Date: November 17, 2016

By: /s/ V. James DeSimone  
V. JAMES DESIMONE, ESQ.  
KAVEH NAVAB, ESQ.  
JOHN RALPHING, ESQ.

Attorneys for Plaintiff,  
SHERYNE CAMPRONE,  
Mother of deceased

1 Date: November 17, 2016 By: /s/ Colleen R. Smith, Esq. (authorized via email)

2 MICHAEL N. FEUER, ESQ.  
3 THOMAS H. PETERS, ESQ.  
4 CORY M. BRENT, ESQ.  
5 COLLEEN R. SMITH, ESQ.

6 Attorneys for Defendants,  
7 CITY OF LOS ANGELES  
8 CHIEF CHARLIE BECK

9 Date: November 17, 2016 By: /s/ Thomas Hurrell, Esq. (authorized via email)

10 THOMAS C. HURRELL, ESQ.  
11 WARREN M. WILLIAMS, ESQ.  
12 ANGELA Y. PARK, ESQ.

13 Attorneys for Defendant,  
14 OFFICE CLIFFORD PROCTOR

15 Date: November 17, 2016 By: /s/ Kenneth P. Korosi, Esq. (authorized via email)

16 STEVEN J. ROTHANS, ESQ.  
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18 JILL WILLIAMS, ESQ.  
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20 Attorneys for Defendant  
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